



October 20, 2023

Hon. Steven Guilbeault, P.C., M.P.
Minister of Environment and Climate Change
ministre-minister@ec.gc.ca

Hon. Mark Holland, P.C., M.P.
Minister of Health
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Hon. Lawrence MacAulay, P.C., M.P.
Minister of Agriculture and Agri- food
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Dear Ministers Guilbeault, Holland and MacAulay,

Re. CropLife's role in public policy development

We are deeply troubled by recent media reports on the ways in which CropLife – the industry association representing plant biotechnology and pesticide companies – was permitted to influence development of new federal regulatory guidance concerning gene editing technologies.¹ We urge you to review CropLife's role in this and other policy development processes and put in place safeguards to prevent inappropriate industry influence.

Documents obtained by Radio-Canada indicate that representatives of CropLife and Canada Grains Council (of which CropLife is a member and chair of the board) worked directly with officials from Agriculture and Agri-food Canada, the Canadian Food Inspection Agency and Health Canada to "co-develop" updated CFIA guidance on Plants with Novel Traits. According to Radio-Canada this

¹ See : Radio-Canada, [« Tiger Team » : quand fonctionnaires et lobbyistes coopèrent dans l'ombre](#), September 26, 2023; and Radio-Canada, [Le gouvernement canadien assure être indépendant du lobby agrochimique](#), September 27, 2023.

industry-government “tiger team” also appears to have intervened behind the scenes in the development of related Health Canada guidance.²

These revelations have raised concerns about regulatory capture, as well as questions about the integrity of public and scientific consultations on matters of interest to CropLife and its member companies.

As representatives of environmental organizations, we are participating in good faith in various consultative processes in relation to federal pesticide regulation -- including the Pest Management Regulatory Agency transformation agenda and regulatory proposals (Health Canada), the Sustainable Agricultural Strategy (AAFC) and the Biodiversity Strategy with respect to Target 7 of the Montreal-Kunming Global Biodiversity Framework (ECCC). Some of us are also participating in ongoing consultations on New Substance Notification for Organisms, Chemicals and Polymers. We would like to know **how many industry-government working groups** are feeding into these and other processes, who is participating in these groups and their terms of reference.

We seek your assurance that CropLife is not being granted preferential access to pesticide-related policy development processes, and that your departments do not rely on industry representatives to “co-develop” pesticide regulations and guidance.

People in Canada need to have confidence that government decision-making is independent, grounded in robust science in the public interest and not unduly influenced by industry interests.

Sincerely,

Lisa Gue, National Policy Manager, David Suzuki Foundation

Cassie Barker, Toxics Senior Program Manager, Environmental Defence

Laura Bowman, Staff Lawyer, Ecojustice Canada

Ted Cheskey, Naturalist Director, Nature Canada

Charlotte Dawe, Conservation and Policy Campaigner, Wilderness Committee

Jane McArthur, Toxics Program Director, Canadian Association of Physicians for the Environment (CAPE)

Theresa McClenaghan, Executive Director and Counsel, Canadian Environmental Law Association

Mary Lou McDonald, President, Safe Food Matters Inc.

Silke Nebel, VP Science and Conservation, Birds Canada

Beatrice Olivastri, CEO, Friends of the Earth Canada

Meg Sears, Chairperson, Prevent Cancer Now (PCN)

² Health Canada Guidance on the Novelty Interpretation of Products of Plant Breeding, 2022.